

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**SEACORP, LLC
f/k/a SYSTEMS ENGINEERING
ASSOCIATES CORPORATION,**

Plaintiff

v.

TITAN ONE ZERO LLC

Defendant.

Case No. 1:22-cv-01019-PTG-IDD

JOINT MOTION TO RESET DEADLINES

The parties jointly request that this Court reset the deadlines for the parties' Rule 26(a)(3) disclosures, exhibit lists, witness lists, and written stipulation of uncontested facts from July 12, 2023, to July 19, 2023, for good cause as demonstrated below.

On May 30, 2023, the Court set the deadlines for the parties' Rule 26(a)(3) disclosures, exhibit lists, witness lists, and written stipulation of uncontested facts for Wednesday, July 12, 2023. ECF 38. The Court also set the close of discovery for July 7, 2023. *Id.*

The parties have been diligently attempting to complete discovery. Due to the large number of nonparty witness depositions, the parties have had difficulties in scheduling all depositions within the discovery period. Four depositions were held during the last two days of the discovery period, and two depositions are being held out of time, given the scheduling difficulties the parties have faced. Specifically, Plaintiff's Rule 30(b)(6) deposition of Defendant and Plaintiff's deposition of Defendant's Chief Executive Officer, Christopher Wu are scheduled outside the close of discovery for July 11, 2023, to accommodate Mr. Wu's schedule who is also

Defendant's corporate designee.

Because the parties must take depositions out of time, and because numerous depositions are being conducted at the close of the discovery period, the parties will face great difficulty in completing their Rule 26(a)(3) disclosures, exhibits lists, witness lists, and written stipulation of uncontested facts by the current July 12, 2023, deadline. The parties will not be able to obtain all transcripts from the depositions prior to the current deadline, which will interfere with the parties' abilities to draft the required filings. The parties therefore respectfully request the Court reset these deadlines by one week, moving the deadline to Wednesday, July 19, 2023. Resetting the deadlines will provide a more efficient avenue for the parties to complete the filings as the parties will have sufficient time to obtain transcripts and complete their review of discovery, thereby reducing any potential need for supplemental filings.

WHEREFORE, the parties respectfully request that the Court reset the deadlines for the parties' Rule 26(a)(3) disclosures, exhibit lists, witness lists, and written stipulation of uncontested facts to July 19, 2023.

The parties do not request a hearing on this Motion.

Date: July 9, 2023

Respectfully Submitted,

By: /s/ Walker J. Gray
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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2023, I filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will then send notification of this filing to the following users:

Matthew E. Feinberg, Esq.
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_____/s
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